

# PUBLIC SUBMISSION

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**Docket:** EPA-R03-OW-2010-0736

Draft Chesapeake Bay Total Maximum Daily Load

**Comment On:** EPA-R03-OW-2010-0736-0001

Clean Water Act Section 303(d): Notice for the Public Review of the Draft Total Maximum Daily Load (TMDL) for the Chesapeake Bay

**Document:** EPA-R03-OW-2010-0736-0731

Comment submitted by Peggy Jamison, Oakland Mayor for Garrett County Municipalities, Inc.

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## Submitter Information

**Submitter's Representative:** Oakland Mayor, Peggy Jamison

**Organization:** Garrett Co. Municipalities

**Government Agency Type:** Local

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## General Comment

Garrett County Municipalities, Inc. (GCM) which is comprised of all eight incorporated municipalities in Garrett County (Accident, Deer Park, Friendsville, Grantsville, Kitzmiller, Loch Lynn Heights, Mt. Lake Park and Oakland) wishes to add their voices to the concerns and comments provided by the Garrett County Planning Commission. At the most recent GCM meeting, we reviewed the comments made by the City of Cumberland and Allegany County and discussed the implications of this issue with John Nelson, Garrett County Director of Planning and Land Development. In addition, the County Circuit Rider, who provides administrative support to the eight municipalities, attended a meeting hosted by Allegany County last week and will continue to participate as our representative.

In general, there will be serious implications from this Phase I WIP and the impact on the small, budget-challenged towns of Garrett County is going to be significant. The local governments continue to be faced with major budget deficits and there does not appear to be an end in sight to the loss of revenue facing the towns. We wholeheartedly agree with the Garrett County Planning Commission that any cost for the implementation of this program must be accompanied by adequate funds to offset the costs. As areas of existing development, the towns will be faced with disproportionate costs to correct or mitigate stormwater issues; yet, all the state's recent initiatives (Smart Growth and Sustainable Communities) encourage development in areas of existing development.

Finally, we would echo the comments made by Allegany County and by the Garrett County Planning Commission that the overlap of the timelines for the comment/input phase and implementation phase of both Phase I and Phase II WIP do not allow for the towns to fully understand the requirements and the implications of those requirements.